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December 13, 2021

**VIA ECF**

The Honorable Barbara Moses  
United States District Court  
Southern District of New York  
Daniel Patrick Moynihan United States Courthouse  
500 Pearl Street, Room 740  
New York, New York 10007-1312

Re: *Assad v. Pershing Square Tontine Holdings, Ltd., et al.*,  
Case No. 21-cv-06907 (AT)(BCM)

Dear Judge Moses:

We, along with co-counsel, represent the Plaintiff in the above-captioned action and respectfully submit this letter in response to Defendants' letter motions seeking to stay discovery. Plaintiff takes no position on the stay motions because Judge Torres has already twice denied requests to stay discovery in this action and set a short discovery schedule, which Plaintiff is diligently seeking to follow.

Defendants' complaints about Plaintiff's discovery requests are inaccurate. The document requests are wholly proper, and any objections can be dealt with once they are actually raised by Defendants under FRCP 34. Their responses are due December 17, 2021.

Respectfully submitted,

  
Cory Buland

cc: All Counsel of Record (via ECF)